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9 Attorneys for Defendant  
10 CMT USA, INC., a North Carolina corporation

11 UNITED STATES DISTRICT COURT  
12 SOUTHERN DISTRICT OF CALIFORNIA

13 JOON PARK, an individual,  
14 Plaintiff,  
15 v.  
16 CMT USA, INC., a North Carolina  
17 corporation,  
18 Defendant.

CV NO. 08 CV 0668 DMS (NLS)

**JOINT MOTION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

Judge: Hon. Dana M. Sabraw

Complaint: April 14, 2008

19 Pursuant to Civil Local Rule 7.2, Plaintiff and Defendant, through counsel of record,  
20 hereby respectfully request a sixteen (16) calendar day extension of time for Defendant to  
21 respond to the summons and complaint. If granted, this joint motion would extend the response  
22 date from May 12, 2008 to May 28, 2008. Good cause exists for the requested extension because  
23 Defendant, a North Carolina corporation, has only recently retained local counsel admitted in the  
24 Southern District of California and said counsel, along with principal counsel at Frommer

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1 Lawrence & Haug in New York, require a brief additional period of time to prepare and file *pro*  
2 *hac vice* applications and to analyze and respond to the complaint.

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4 Dated: May 12, 2008

DLA PIPER US LLP

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6 By: s/ Richard T. Mulloy

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28 Dated: May 12, 2008

THE ADAMS LAW FIRM

By: s/ Paul Adams

PAUL ADAMS  
Attorneys for Plaintiff  
JOON PARK